

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

MASSACHUSETTS SOBER HOUSING )  
CORPORATION, )

Plaintiff )

v. )

CITY OF CHELSEA, JAY ASH, in his capacity )  
as City Manager of the City of Chelsea, )  
JOSEPH COONEY, in his capacity as Director )  
of the Department of Inspectional Services of )  
the City of Chelsea, and JOSEPH SIEWKO, )  
in his capacity as Fire Chief of the City of )  
Chelsea, )

Defendants )

) Civil Action No.

04 cv 10753 JLT

**PLAINTIFF'S APPLICATION FOR PRELIMINARY INJUNCTION**

For the reasons stated in the Verified Complaint, and Memorandum of Law, filed herewith, plaintiff Massachusetts Sober Housing Corporation moves that the Court issue a preliminary injunction against all defendants requiring them to:

1. Issue forthwith a Certificate of Occupancy allowing ten male veterans in recovery from alcoholism and/or drug addiction to take up residence at the house at 68 Hooper Street, Chelsea, Massachusetts;
2. Treat said house as a single family residence for zoning, building code, sanitary code, fire safety, and all other purposes.

3. Cease and desist from interfering with or obstructing the quiet enjoyment of the use by the residents of said house as an Oxford House.
4. Comply with such other orders as the Court deems appropriate.

Dated: April 13, 2004

MASSACHUSETTS SOBER HOUSING  
CORPORATION

By its attorney,



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